Remarks

This application has been reviewed in light of the Office Action dated December 13, 2005.

Claims 13-15, 17-42 and 45-61 are pending in this application. Claims 1 -12 were withdrawn. Claims

16, 43 and 44 were previously canceled. Claims 18-21, 31, 36-38, 40-42, 45-47, 49-53, 55-57 and 59-61

have been amended to define still more clearly what Applicants regard as their invention. Claims 13, 19,

21, 27, 36, 45, 50 and 55 are in independent form. Favorable reconsideration is respectfully requested.

The Examiner is thanked for the indication that Claims 13-15, 17-18, 27-31, 34-42, 45-49 and 55-

61 are allowed. Claims 21-25 have been rewritten in independent form including all of the limitations of

the base claim and any intervening claims. Applicants believe that Claims 21-25 are in allowable form.

Claims 19-20, 26 and 50-52 were rejected under 35 U.S.C. §102(e) as being anticipated by

Schneider et al., U.S. Patent No. 6,222,551 (Schneider). Applicants respectfully traverse this rejection.

To support a rejection under § 102(e), the cited prior art reference must disclose each element of

the rejected claim in the manner recited by the claim. Here, rejection under § 102(e) cannot be supported

because Schneider does not teach each element of the invention as recited by amended Claims 19, 20 and

50-52. Applicants submit that independent Claims 19, and 50-52, as amended, are patentably distinct

from the cited prior art for at least the following reasons.

Independent Claim 19, as amended, recites a method implemented in a computer-aided design

system of displaying a three-dimensional model having a plurality of two-dimensional views associated

therewith, each view comprising a representation of the three-dimensional model from a predetermined

15

viewpoint comprising rotating the three-dimensional model to present a first one of the views, said views

comprising views generated based on the three-dimensional model; pausing to show the first one of the

views; and continuously rotating and pausing the model to present other ones of the views.

Schneider teaches a method to address the problem of sending large amounts of data through a

network with a limited bandwidth, which may prevent real-time operations with the model (see col. 1,

lines 25-33). In order to overcome this limited bandwidth, Schneider teaches transmission of smaller

amounts of data in the form of specific views of a model to "provide visual feedback and guide the user

into selecting the desired orientation," then "renders an image of the model from the user-specified view

direction," and transmits the image from a server device to a client device (see col. 2, lines 25-28, and col.

6, lines 5-11). Additionally, to limit the amount of data transmitted, Schneider teaches a server that

generates several views of a model and transmits those views to a client device. The client device then

displays the views by mapping the views of a model "onto a simple geometric shape," and this mapping

method may be and is preferably a texture-mapping method (see col. 5, lines 39-46, and lines 66-67).

Moreover, Schneider discloses that it is not possible to rotate a three-dimensional model in real-time and,

instead, transmits various views to guide the user into selecting the orientation of a rendered image.

Schneider specifies that only when a viewpoint is indicated will the object be rendered from the chosen

viewpoint (see col. 7, lines 62-67).

Schneider, however, does not teach or suggest, at least, the element of comprising a

representation of the three-dimensional model from a predetermined viewpoint comprising rotating the

three-dimensional model to present a first one of the views, said views comprising views generated based

16

Request for Continued Examination

Application No. 09/394,824

Docket No. 006175-00005

on the three-dimensional model; pausing to show the first one of the views; and continuously rotating and

pausing the model to present other ones of the views.

Independent Claim 50 is an apparatus claim corresponding to method Claim 19, as amended, and

also believed clearly patentable over Schneider for substantially the same reasons as those presented

above with respect to Claim 19, as amended. Accordingly, the claims, as amended, are patentable over

Schneider.

Claims 32-33 and 53-54 were rejected under 35 U.S.C. §103(a) as being unpatentable over

Schneider. Applicants respectfully traverse this rejection.

Claim 32 depends on independent Claim 19, as amended. Independent Claim 19, as amended, is

patentable over Schneider as set forth above. Therefore, Claim 32, which depends on Claim 19, is

patentable for the same reasons. Claims 53 is dependent on independent Claim 50, as amended. Claim

50 is patentable over Schneider as set forth above. Therefore, Applicants believe that Claims 32-33 and

53-54 are patentable over the Schneider.

A review of the art of record has failed to reveal anything that, in Applicants' opinion, would

remedy the deficiencies of the art discussed above, as applied against the independent claims herein.

Therefore, those claims are respectfully submitted to be patentable over the art of record. It is

respectfully requested that the Examiner withdraw the claim rejections and allow the claims.

17

Request for Continued Examination

Application No. 09/394,824

Docket No. 006175-00005

The other rejected claims in this application depend from one or another of amended independent

claims, discussed above and, therefore, are submitted to be patentable for at least the same reasons. Since

each dependent claim is also deemed to define an additional aspect of the invention, individual

consideration or reconsideration, as the case may be, of the patentability of each claim on its own merits

is respectfully requested.

18

Request for Continued Examination Application No. 09/394,824 Docket No. 006175-00005

CONCLUSION

Claims 13-15, 17-42 and 45-61 are now pending. Accordingly, it is respectfully submitted that all pending claims are in condition for allowance. Applicants respectfully request that all pending claims be allowed.

Please charge any additional fees for this Amendment or credit any overpayments to Deposit Account No. 50-0521.

Respectfully submitted,

ChandanaRas

Date:

May 15, 2006

Chandana R. Rao

Reg. No. 52, 150

Clifford Chance US LLP

31 West 52nd Street

New York, NY 10019-6131

Telephone: (212) 878-3107